

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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JANE DOE, LUKE LOE, RICHARD ROE, and MARY :  
MOE, individually and on behalf of all others similarly :  
situated, :  
:

*Plaintiffs,* :

v. :

THE TRUMP CORPORATION, DONALD J. TRUMP, in :  
his personal capacity, DONALD TRUMP, JR., ERIC :  
TRUMP, and IVANKA TRUMP, :  
:

*Defendants.* :  
:  
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No. 1:18-cv-09936 (LGS)

**DECLARATION OF DAVID SPEARS PURSUANT TO LOCAL RULE 1.4**

I, David Spears, declare and state as follows:

1. I am a partner at Spears & Imes LLP, co-counsel for Defendants The Trump Corporation, Donald J. Trump in his personal capacity, Donald Trump, Jr., Eric Trump and Ivanka Trump. Pursuant to Local Civil Rule 1.4, I respectfully request leave of the Court to withdraw my individual appearance as counsel for Defendants. Joanna C. Hendon, Cynthia Chen, and Bradley Pollina, also from the law firm of Spears & Imes LLP, will continue to represent Defendants.

2. Because my partner Joanna C. Hendon, along with other attorneys at Spears & Imes LLP, will continue to represent Defendants, this withdrawal will not affect this action in any way, including the posture of the case. Nor will this withdrawal prejudice the Plaintiffs.

3. Neither Spears & Imes LLP nor I is asserting any retaining or charging lien on our clients.

4. I am causing this motion, including all of the papers submitted with the motion, to be served on Spears & Imes LLP's clients in this matter.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: January 28, 2019  
New York, New York

By: /s/ David Spears  
David Spears